

EQUINOX RESOURCES (WASH.) LTD.

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**Superfund Response and
Investigation Branch**

April 27, 1995

MAY - 2 1995

Monica Rolluda
Site Assessment Manager
United States Environmental
Protection Agency
Region 10
1200 Sixth Avenue
Seattle, WA. 98101

Attention: HW-114

Dear Monica:

Re: Onion Creek, Van Stone Mine

We have received your letter of April 11, 1995 regarding well sampling at the above site. In general Equinox (Wash.) is not willing to commit to collect the well samples due to several concerns including budget.

The Van Stone Mine is currently in compliance with all Washington Department of Ecology and Department of National Resources underground and surface water sample monitoring requirements. These results are now routinely copied to the EPA. It is our understanding that the waters of the project site and its environs fall under Washington State control. First, under what authority and jurisdiction is EPA requesting these samples?

Secondly the residential wells are located on private property. Access must be sought from the individual owners. Typical EPA well sampling procedures follow a defined protocol which includes purging three volumes of water prior to sampling. Would the EPA be willing to permit deviation from this procedure to increase the possibility of well owners granting permission for the sampling.

If Equinox (Wash.)'s request for entry is refused we will be unable to pursue collection. In addition, Pan American would need to rely on owner information about well construction and development. It would be easy to obtain false lead highs from long forgotten lead pipes or solders.

There are no wells upstream of the area and Equinox (Wash.) is not prepared to drill a well for background valuations.



On a technical basis, it has been our previous Canadian experience that simply measuring lead values without considering pH, turbidity, presence other trace metals, organic content, sulphur speciation, etc., can lead to confusing results. Numbers produced will not necessarily be comparable even within a local sampling regime.

While most of the tailings and waste dump sampling to date has shown uniformly low lead values, erratic spot highs have been recorded. Geologically these can be explained as the result of a few extremely localized discontinuous quartz stringers with minor galena. How would such sampling discriminate between such a localized source and a broader based contamination problem.

Equinox (Wash.) budget's this year has been earmarked for reclamation, with the main focus being the old Asarco tailings. This is the area of concern, and a written plan of this year's proposed work will be filed with the Department of Natural Resources in May with a copy forwarded to your office. The fact that the Department of Ecology is also unwilling to take samples at the present time further encourages us not to commit to this sampling unless convinced of the validity of the sampling methodology and purpose.

We tried to reach you by phone, but were unsuccessful. Please call if you have any questions (I'm away next week in Mexico).

Regards,

EQUINOX RESOURCES (WASH.) LTD.



John Wright
President

JHW:bjp

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